

BHSF  
9.8.1.1  
9/26/95



RECEIVED

September 26, 1995

Reply To  
Attn. Of: ES-098

SEP 26 1995

SUPERFUND BRANCH

MEMORANDUM

SUBJECT: Bunker Hill  
Kellogg, ID  
Asbestos demolition demonstration

FROM: Keven McDermott, ESD  
Civil Investigator

TO: Steve Mullen, ATD  
Acting NESHAPs Coordinator

At the request of Howard Blood and Earl Liverman of the Hazardous Waste Division, I attended an asbestos demolition demonstration at the Bunker Hill Superfund Site, Kellogg, ID. Prior to the demonstration I reviewed the general work plan submitted by Morrison Knudsen for demolishing intact one wall of the S-22 Pelletizing Plant. The intent was to determine if the walls could be torn down in compliance with NESHAPs regulations without first removing the external transite siding. The plan called for a bed of slag to be prepared for the wall to fall onto. This slag as well as the wall itself were to be thoroughly wetted prior to and during demolition. The wall would then be buried in place with slag, of which there is an abundant supply on site.

On the morning of September 20, 1995, I attended a biweekly coordination meeting with engineers from Morrison Knudsen, Idaho DEQ personnel, and EPA employees representing Superfund, Air and Toxics Division, Environmental Services Division, and the Idaho Operations Office. During the meeting we discussed the planned demonstration and methods for evaluation the project.

At approximately 1400 hours the demonstration occurred. Rebecca Goehring,

USEPA SF



1327069

a NESHAPs inspector with the Idaho Operations Office, and I planned to enter the containment area with representatives from Morrison Knudsen and the Army Corps of Engineers. We watched the project from an adjacent hillside, from which we had a good view of the demolition. As the cable cut through the supporting structures holding the wall in place, we observed no visible emissions. However, we noted the cable appeared to do considerable damage to the transite siding. The wall did not fall cleanly in place, but was separated into numerous small pieces through the cutting action of the cable.

As soon as the wall had been taken down, we donned appropriate protective equipment and entered the containment area. We found the slag bed and demolition debris to be thoroughly wet. As we examined the pieces of transite, we observed they varied in size from something as small as a splinter to large sections of a square foot or more. Many sections of transite had been reduced to fragments of an inch or smaller. The question we sought to answer was whether the transite had been crumbled, pulverized or reduced to powder during the demonstration, as set forth in 40 CFR Part 61.145(c)(1)(iv). There were enough small fragments of transite to conclude some of the transite had been crumbled, though not pulverized or reduced to powder. Additionally, the smaller pieces could be crushed with hand pressure.

Following our examination of the demolition area, we met with personnel who had attended the morning biweekly coordination meeting to discuss our findings. Ms. Goehring and I agreed there had been no visible emissions during the demolition and the structure as well as the slag receiving bed had been adequately wet. We both said the cable appeared to be responsible for the significant damage to the transite siding, and a way should be developed to lessen the destruction of the transite prior to dropping the wall. If such a method could not be developed, the transite shingles at the edges of the wall should be removed by hand prior to using the cable shear method. This was agreed upon by Morrison Knudsen and U.S. Army Corps of Engineers personnel, and the meeting adjourned.

Attached to this memorandum are copies of the work plan for the asbestos demolition demonstration performed on the Pelletizing Plant (S-22) and a memorandum dated September 15, 1995, addressed to Ms. Goehring from Mark Ohlstrom, U.S. Army Corps of Engineers.

If you have any questions concerning the information I have provided, please feel free to contact me at (206) 553-6698. If your office or the Superfund program would like me to participate in the next demonstration project planned for sometime in October 1995, I would be happy to do so.

cc: Howard Blood